

ILLINOIS POLLUTION CONTROL BOARD
February 1, 2007

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	
)	
v.)	AC 04-51
)	(IEPA No. 83-04-AC)
MICHAEL MORETON,)	(Administrative Citation)
)	
Respondents.)	

MICHELLE M. RYAN APPEARED ON BEHALF OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY; and

MICHAEL MORETON APPEARED *PRO SE*.

INTERIM OPINION AND ORDER OF THE BOARD (by T.E. Johnson):

The Board today decides whether the respondent Michael Moreton (Moreton) violated the Environmental Protection Act (Act) (415 ILCS 5/1 et seq. (2004)), by causing or allowing the open dumping of waste in a manner that resulted in litter and the deposition of construction or demolition debris at the southeast corner of the intersection of Coles County roads 1380 N and 2330 E, T.13N-R.10E, Ashmore Township, Ashmore in Coles County.

For the reasons explained fully below, the Board finds that Moreton violated Section 21(p)(1) and (7) of the Act (415 ILCS 5/21(p)(1) and (7) (2004)) as alleged by the Illinois Environmental Protection Agency (Agency) in the administrative citation. The Board assesses the statutory civil penalty of \$3,000 and finds Moreton liable for hearing costs incurred by the Board and the Agency.

ADMINISTRATIVE CITATION PROCESS

Section 31.1 of the Act authorizes the Agency and units of local government to enforce specified provisions of the Act through an administrative citation. 415 ILCS 5/31.1 (2004). Part 108 of the Board's procedural rules provides the process of a citation before the Board. 35 Ill. Adm. Code 108 *et seq.* Unlike other environmental enforcement proceedings in which the Act prescribes a maximum penalty, *see, e.g.*, 415 ILCS 5/42(b)(1) (2004), the Act sets specific penalties for administrative citations. 415 ILCS 5/42(4, 4-5) (2004). In cases such as this, the Board has no authority to consider mitigating or aggravating factors when determining penalty amounts. *Id.* "[I]f the Board finds that the person appealing the [administrative] citation has shown that the violation resulted from uncontrollable circumstances, the Board shall adopt a final order which makes no finding of violation and which imposes no penalty." 415 ILCS 5/31.1(d)(2) (2004).

PROCEDURAL HISTORY

On February 6, 2004, the Agency filed an administrative citation with the Board alleging that Moreton violated the Act at the southeast corner of the intersection of Coles County roads 1380 N and 2330 E, T.13N-R.10E, Ashmore Township, Ashmore in Coles County (site).¹ The citation specifically alleges that Moreton violated Section 21(p)(1) and (7) of the Act (415 ILCS 5/21(p)(3) (2004)) by causing or allowing the open dumping of waste resulting in litter and the deposition of construction or demolition debris open burning. AC at 2.

As required, the Agency served the administrative citation on Moreton within “60 days after the date of the observed violation.” 415 ILCS 5/31.1(b) (2004); *see also* 35 Ill. Adm. Code 108.202(b). On March 31, 2004, Moreton filed a petition for review of the administrative citation. On April 15, 2004, the Board issued an order finding the petition for review deficient and directing Moreton to file an amended petition for review on or before May 14, 2004. On May 11, 2004, Moreton filed an amended petition for review. On June 3, 2004, the Board issued an order that accepted the petition for hearing.

On July 19, 2006, Board Hearing Officer Carol Webb conducted a hearing at the City Hall Council Chambers, 208 North 19th Street in Mattoon. At the hearing, Michelle Ryan appeared and participated on behalf of the Agency, and Michael Moreton appeared *pro se*. Kenneth W. Keigley, and Agency inspector, and Moreton testified at the hearing. Hearing Officer Webb found that credibility was not an issue in regards to either witness. Tr. at 36. The Agency’s inspection report, including photographs of the site, was offered and accepted as an exhibit at the hearing.

The hearing officer set a briefing schedule requiring the Agency to file its brief by August 15, 2006; Moreton to file his brief by September 1, 2006; and the Agency to file a reply, if any, by September 8, 2006. The Board received the transcript on July 31, 2006. Both parties timely filed briefs in this matter. The Board has not received a reply brief.

FACTS

On January 20, 2004, Agency inspector Kenneth W. Keigley (Keigley) inspected the site as a result of a citizen’s complaint. Tr. at 9, 26. Keigley has been a field inspector for the Agency for 11 years. Tr. at 7. As such, he visits different sites and facilities, including open dumps, for the purpose of determining if they are in compliance with the Illinois environmental regulations and the Act. Tr. at 7. He has conducted between thirteen and fourteen hundred inspections for the Agency. Tr. at 8.

Keigley holds a Bachelor of Arts degree from Governors State University, a Bachelor of Business Administration degree from Eastern Illinois University, and has completed significant course work in environmental biology at Governors State University. *Id.* He has also completed

¹ The Board cites the administrative citation as “AC at _.”; the hearing transcript as “Tr. at _.”; and the hearing exhibits as “Ex. 1 at _.”

various training courses in procedures to use inspecting sites that were sponsored by the Agency. *Id.* Keigly has inspected the site three times. Tr. at 9.

Keigly took 16 photographs depicting the condition of the site that are attached to the inspection report that was accepted into evidence. Tr. at 28. The photographs show several different piles of used tires some of which have scraps of dimensional lumber mixed in with them. Tr. at 11. Keigly testified that the tires were both on and off rims, and that some of the tires had water in them in the form of ice. Tr. at 11. Keigly testified that he observed a pile of what appeared to be gravel, concrete, small pieces of asphalt, plastic and wooden pallets, and a pile of scraps of dimensional lumber that was weathered and overgrown by vegetation during his inspection. *Id.* He stated that most of the piles of tires were overgrown by vegetation, and that the southwest corner of the property held a large pile of several hundred wooden ammunition boxes, and that there were several vehicles and older mobile homes on the site. *Id.*

Specifically, Keigly identified metal, what appears to be an older kitchen stove, pieces of plastic, and what appears to be an upholstered vehicle seat in photograph 1. Tr. at 11. He identified dimensional lumber in photographs four, six and seven. Tr. at 12. Keigly testified that one area of the site (pictured in photograph ten) contained two 55-gallon drums, and that there was an area measuring approximately eight-by-four feet that was visibly contaminated with a black oily substance. Tr. at 12. Keigly testified that the photographs accurately depict the condition of the site on January 20, 2004. Tr. at 13.

Keigly testified that photographs 2, 6, 7, 8, 9, 10, and 12 depict tires being stored or dumped on the ground. Tr. at 22-23. Keigly estimates that approximately 255 tires from different types of vehicles were at the site on January 20, 2004. Tr. at 23. The material in photograph 16 was identified by Moreton as concrete pit wash from a concrete mixing plant in Mattoon. Tr. at 20.

Moreton runs a salvage business, and recycles metals. Tr. at 14. Keigly testified that the metals in the first photograph are recyclable metals. Tr. at 15. Keigly admitted that the tires in photographs 5, 13, and 15 are contained in a trailer, containers and a flatbed trailer respectively. Tr. at 17.

Moreton is an auto parts recycler licensed by the Secretary of State's office. Tr. at 28. He has been licensed for over ten years. *Id.* Moreton testified that this gives him the authority to deal in automotive parts and cars any place in the state. *Id.* Moreton has owned the site and used it for business purposes for the last 13 years. Tr. at 22. Keigly acknowledged that Moreton is licensed by the Secretary of State's office, and permitted to have 10,000 automobiles on site as part of the recycling operation, if it's done in a timely fashion. Tr. at 20.

Moreton has recycled metals for 30 years. Tr. at 29. He ships truck trailer loads of metals to be recycled, and recycles all types of metals, including brass, aluminum, copper, steel, and automotive batteries. *Id.* He makes his living buying and selling. *Id.* Moreton made a verbal agreement to sell the ammunition boxes to Rural King in Mattoon. *Id.* He claims that Rural King reneged on the deal, but that the ammunition boxes are still there, and are made out

of treated wood so they do not deteriorate like a piece of two-by-four or regular lumber. *Id.* The ammunition boxes are for sale at one dollar apiece. *Id.*

Moreton bought the site 13 years ago for his business, and has used it for business ever since. Tr. at 30. He has never lived at the site. He acknowledged that “some of the tires got out of hand” because he was running six trucks, two car crushers and fourteen employees which generated significant material quickly. *Id.* He estimated that he was shipping over 100 tons of metal per day. *Id.*

Moreton had a rim crusher built to separate the rims from the tires when they were disposed of. Tr. at 30. The rim crusher broke after 30 tires were completed. *Id.* Moreton refabricated the rim crusher and uses it to separate tires from wheels when recycling. *Id.* The tires that are removed from the rims are stored in a tarped, tailgated trailer, and removed when the trailer gets full. *Id.* Moreton cannot afford to ship 30 or 40 tires at a time in light of the fuel cost. *Id.*

Moreton estimates that 50 cars entering the yard per week results in 200 tires a week that have to be dealt with. Tr. at 31. He asserts that the operation is constant and ongoing, not a situation where he went out and bought a bunch of junked cars, took the tires off and threw them on the ground. *Id.* Moreton asserts that he can identify people who are burning tires, and throwing them over the hill. Tr. at 33. He states that he is no worse, and a lot better than most of the people in his business. *Id.*

In the past, Moreton would use portable crushers, and visit different salvage yards or individuals, whenever somebody had the volume of cars to accommodate a crusher. Tr. at 33-34. The site was used for overflow and to crush what he purchased locally. *Id.*

Moreton is not a registered tire hauler. Tr. at 34. A gentleman from Madison, Indiana, and a business associate in Garrett, Illinois, haul his tires. *Id.* Moreton asserts that as a licensed auto parts recycler, the rims and tires are automotive parts that come off the cars and are recyclable materials. Tr. at 34. Moreton generally sells the tire rims, but gives the tires away. Tr. at 35. When a customer buys a rim, he gets a tire with it. *Id.*

STATUTORY BACKGROUND

Section 3.305 of the Act defines “open dumping” as:

[T]he consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a landfill. 415 ILCS 5/3.305 (2004).

Section 3.385 of the Act defines “refuse” as “waste.” 415 ILCS 5/3.385 (2004).

Section 3.535 of the Act provides that:

“Waste” means any garbage, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows, or coal combustion by-products as defined in Section 3.135, or industrial discharges which are point sources subject to permits under Section 402 of the Federal Water Pollution Control Act, as now or hereafter amended, or source, special nuclear, or by-product materials as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 921) or any solid or dissolved material from any facility subject to the Federal Surface Mining Control and Reclamation Act of 1977 (P.L. 95-87) or the rules and regulations thereunder or any law or rule or regulation adopted by the State of Illinois pursuant thereto. 415 ILCS 5/3.535 (2004).

The Litter Control Act defines “litter” as:

any discarded, used or unconsumed substance or waste. “Litter” may include, but is not limited to, any garbage, trash, refuse, debris, rubbish, grass clippings or other lawn or garden waste, newspaper, magazines, glass, metal, plastic or paper containers or other packaging construction material, abandoned vehicle (as defined in the Illinois Vehicle Code), motor vehicle parts, furniture, oil, carcass of a dead animal, any nauseous or offensive matter of any kind, any object likely to injure any person or create a traffic hazard, potentially infectious medical waste as defined in Section 3.360 of the Environmental Protection Act, or anything else of an unsightly or unsanitary nature, which has been discarded, abandoned or otherwise disposed of improperly. 414 ILCS 105/3 (a) (2004).

The Act defines “general construction or demolition debris” as:

non-hazardous, uncontaminated materials resulting from the construction, remodeling, repair, and demolition of utilities, structures, and roads, limited to the following: brick, concrete, and other masonry materials; soil; rock; wood, including non-hazardous painted, treated, and coated wood and wood products; wall coverings; plaster; drywall; plumbing fixtures; non-asbestos insulation; roofing shingles and other roof coverings; reclaimed asphalt pavement; glass; plastics that are not sealed in a manner that conceals waste; electrical wiring and components containing no hazardous substances; and piping or metals incidental to any of those materials.

General construction or demolition debris does not include uncontaminated soil generated during construction, remodeling, repair, and demolition of utilities, structures, and roads provided the uncontaminated soil is not commingled with any general construction or demolition debris or other waste. 415 ILCS 5/3.160(a) (2004).

Section 21(a) of the Act provides that no person shall “[c]ause or allow open dumping of any waste.” 415 ILCS 5/21(a) (2004).

Section 21(p) of the Act provides that no person shall:

In violation of subdivision (a) of this Section, cause or allow the open dumping of any waste in a manner which results in any of the following occurrences at the dump site:

- (1) litter... * * *
- (7) deposition of:
 - (i) general construction or demolition debris as defined in Section 3.160(a) of this Act; or
 - (ii) clean construction or demolition debris as defined in Section 3.160(b) of this Act.” 415 ILCS 5/21(p)(1), (7) (2004).

Section 31.1(d)(2) of the Act provides that:

[I]f the Board finds that the person appealing the [administrative] citation has shown that the violation resulted from uncontrollable circumstances, the Board shall adopt a final order which makes no finding of violation and which imposes no penalty. 415 ILCS 5/31.1(d)(2) (2004).

Section 42(b)(4-5) of the Act provides that:

In an administrative citation under Section 31.1. of this Act, any person found to have violated any provision of subsection (p) of Section 21 of this Act shall pay a civil penalty of \$1,500 for each violation of each such provision, plus any hearing costs incurred by the Board and the Agency. . . . 415 ILCS 5/42(b)(4-5).

AGENCY’S BRIEF

The Agency argues it has demonstrated that Moreton caused or allowed open dumping on the site, in that the inspection report admitted into evidence, and the testimony at hearing, show that tires, dimensional lumber, plastic and metal pallets, wooden ammunition boxes, concrete pit wash, a kitchen stove, an upholstered vehicle seat, plastics, metal, two drums with a black oily discharge, and other unidentifiable items were accumulated throughout the site. Agency Br. at 1.

The identified materials, the Agency asserts, constitute discarded material within the meaning of the term waste. Agency Br. at 1-2. The Agency argues that the wood, tires, appliances, plastics, metal and other items constitute litter under Section 21(p)(1) of the Act, and therefore Moreton violated that section. Agency Br. at 2. Further, the Agency contends that the dimensional lumber visible in the piles in photographs four, six, and seven is mixed in with tires

and other debris. Agency Br. at 2. The Agency declares that Moreton stated at hearing, the material came from a dismantled mobile home, and that a mobile home is a structure under Section 3/160(a) and dimensional lumber qualifies as construction or demolition debris under the Act. Agency Br. at 3.

The Agency asserts that the material in photograph 16 was identified by Moreton as concrete pit wash from a concrete mixing plant in Mattoon, and that concrete pit wash and dimensional lumber meet the definition of construction or demolition debris for purposes of Section 21(p)(7) of the Act, and therefore Moreton violated that section. Agency Br. at 3.

The Agency notes that Moreton claims he is recycling the materials on site, but that several of the photographs show items that have either not been properly recycled, or cannot be recycled. Agency Br. at 4. In the latter category, argues the Agency, is the black oily substance that was released into the environment, as evidenced by the visibly contaminated soils in photograph ten; and in the former category, are the 800 treated wooden ammunition boxes, which Moreton declined to sell to the prospective buyer when the price was insufficient. *Id.*

MORETON'S BRIEF

Moreton contends that Keigly testified he had made previous trips to the site and observed a recycling operation in progress. Moreton Br. at 1. During that visit, Moreton argues, he observed mobile homes that he assumed were abandoned, but failed to check at the Coles County Courthouse to see if the paper work was done to legally store the homes. *Id.* Moreton argues that Keigly also observed a stove and a small pile of multi-colored items, but failed to bend over and pick one up to see whether it was plastic or metal. *Id.*

Moreton asserts that Keigly observed piles of what he called construction debris, but from a previous visit knew to be pitwash on site for a specific purpose. Moreton Br. at 1. Moreton claims that pit wash is a byproduct of an operation that has never been previously used, is a new material until it is used the first time, and is also recyclable. *Id.*

Moreton argues that Keigly observed a mobile home in the process of being dismantled for recycling, and that a pile of wood is a byproduct of the recycling process, as are tires from recycling cars. Moreton Br. at 1. Moreton argues that the 255 tires estimated to be on-site would be less than 60 recycled cars, and from the pictures, all but approximately 30 were in or on containers. *Id.*

Keigly was aware, asserts Moreton, that the two 55-gallon barrels contained hydraulic oil from a car crusher, and that an accidental spill resulting from a repair caused the spot on the ground. Moreton Br. at 2. Moreton argues that the spill has since been cleaned up and disposed of properly. *Id.* Finally, Moreton asserts, Keigly knows that a problem existed between Moreton and a deputy sheriff who owns land adjacent to the site who is using the power of his office to financially hurt Moreton. *Id.* Moreton argues that there are laws to protect people from such actions, and if they don't want him there [at the site], they should take him in front of a judge in Coles County and not the Board. *Id.*

DISCUSSION

Open Dumping of Waste

To prove a violation of Section 21(p) of the Act, the Agency must first prove that Moreton caused or allowed the open dumping of waste. *See* 415 ILCS 5/21(a), (p) (2004). As noted, “open dumping” under the Act is defined as “the consolidation of refuse from one or more sources at a disposal site that does not fulfill the requirements of a sanitary landfill”; “refuse” is “waste”; and “waste” includes “any garbage . . . or other discarded material . . .” 415 ILCS 5/3.305, 3.385, 3.535 (2004).

Moreton does not dispute that he owns the property. Further, Moreton does not deny that the materials described in the Agency inspection report were on his property or that he arranged to have the materials placed there; nor does Moreton argue that his operation meets the requirements of a sanitary landfill. Moreton argues that the material on his property is not waste; that it is all recycleable material, and a byproduct of his business that will ultimately be recycled.

In reviewing the record in this case, the Board finds that Moreton’s claims are not dispositive of whether the material is waste or litter. *See County of Sangamon v. Daily*, AC 01-16, 01-17 (cons.), slip op. at 10, 12-13 (Jan. 10, 2002) (despite expressed “intention to use every single discarded item . . . numerous items were not in use, were not useable in their current condition, and were not stored in such a way as to protect any future use”).

The photographs admitted into evidence show several different piles of used tires, some of which have scraps of dimensional lumber mixed in with them. Exh. 1. Both the photographs in the inspection report and testimony at hearing show that gravel, concrete, asphalt, plastic and wooden pallets, and a pile of scraps of dimensional lumber were to be found at the site. *Id.*, Exh. 1. Much of the material is not protected from the elements and is covered with vegetation.

Photograph ten shows that two 55-gallon drums on an area measuring approximately eight-by-four feet that was visibly contaminated with a black oily substance identified by Moreton to be hydraulic oil from a car crusher.

On this record, the Board finds that the material on the site constitutes discarded material within the meaning of the term waste. Additionally, Moreton consolidated these materials on the site. Even assuming that the site contained a portion of valuable material being managed properly for salvage or recycling, the majority of the items consolidated there and identified during the inspection were “discarded” and thus “waste” under the Act. It is also undisputed that Mr. Stutsman’s site does not meet the requirements for a sanitary landfill.

The Board finds that Moreton caused and allowed open dumping at the site.

Litter

The Act does not define “litter,” but the Board has applied the definition provided in the Litter Control Act, which defines “litter” in part as “any discarded, used or

unconsumed substance or waste.” 415 ILCS 105/3(a) (2004); St. Clair County v. Louis I. Mund, AC 90-64, slip op. at 4, 6 (Aug. 22, 1991). The definition specifically includes refuse, debris, metal, plastic or paper containers or other packaging construction material, abandoned vehicles, motor vehicle parts, oil, and anything else of an unsightly or unsanitary nature, which has been discarded, abandoned or otherwise disposed of improperly. *See* 414 ILCS 105/3 (a) (2004).

The wood, tires, appliances, plastics, metal and other items found on Moreton’s site constitute “litter” under the definition. The Board finds that materials open dumped on Moreton’s site qualify as “litter” under the Act.

Construction or Demolition Debris

The Act’s definition of “general construction or demolition debris” includes “uncontaminated materials resulting from the construction, remodeling, repair, and demolition of utilities, structures, and roads . . .” (415 ILCS 5/3.160(a) (2004)). The definition specifically includes wood, including non-hazardous painted, treated, and coated wood and wood products; roofing shingles and other roof coverings. *Id.*

Moreton’s site contains dimensional lumber, gravel and asphalt. Again, many materials are covered with vegetation. The Board finds that materials open dumped at Moreton’s site qualify as “general construction or demolition debris” under the Act.

Finding of Violations

Having found that Moreton caused and allowed the open dumping of waste resulting in litter and the deposition of general construction or demolition debris, and that none of his purported defenses have merit; the Board finds that Moreton violated Sections 21(p)(1) and (7) of the Act.

Civil Penalty and Hearing Costs

The Agency seeks the statutory \$1,500 civil penalty per violation, for a total of \$3,000, as well as hearing costs. AC at 2. Because Moreton violated Sections 21(p)(1) and (7), the Board now discusses the issues of civil penalty and hearing costs. Both are addressed in Section 42(b)(4-5) of the Act:

In an administrative citation action under Section 31.1 of this Act, any person found to have violated any provision of subsection (p) of Section 21 of this Act shall pay a civil penalty of \$1,500 for each violation of each such provision, plus any hearing costs incurred by the Board and the Agency, except that the civil penalty amount shall be a \$3,000 for each violation of any provision of subsection (p) of Section 21 that is the person’s second or subsequent adjudicated violation of that provision. 415 ILCS 5/42(b)(4-5) (2004).

Moreton states that he has cleaned up the spill from the two 55-gallon drums. He also acknowledges past issues with the placement of the tires, but indicates that this also has been remedied. When the Board finds a violation in a formal enforcement action brought under Section 31 of the Act, the Board has the discretion to impose a penalty and if the Board decides to impose one, the Board may consider factors that mitigate the amount of penalty. *See* 415 ILCS 5/33(c), 42(h) (2004). The Board has no such discretion after finding a violation in an administrative citation action. The Board must impose a civil penalty on Moreton.

There is no indication that this is a second or subsequent adjudicated violation for Moreton. Therefore, the civil penalty for these first violations of Sections 21(p)(1) and (7) by Moreton is statutorily set at \$1,500 per violation, totaling \$3,000, and the Board will assess the penalty in its final opinion and order. *See* 415 ILCS 5/42(b)(4-5) (2004); 35 Ill. Adm. Code 108.500(b)(2).

In addition, by unsuccessfully contesting the administrative citation at hearing Moreton also must pay the hearing costs of the Agency and the Board. *See* 415 ILCS 5/42(b)(4-5) (2004); 35 Ill. Adm. Code 108.500(b)(3). No information on those costs is in the record. The Agency and the Clerk of the Board are therefore each ordered to file a statement of costs, supported by affidavit, and to serve the filing on Moreton. Moreton will have an opportunity to respond to the requests for hearing costs, as provided in the order below.

CONCLUSION

The Board finds that Moreton caused and allowed the open dumping of waste resulting in litter and the deposition of general construction or demolition debris. Having found the violations in this administrative citation action, Moreton must pay a civil penalty of \$3,000 and the hearing costs of the Agency and the Board. As set forth in the order below, the Board directs the Agency and the Clerk of the Board to file hearing cost documentation, to which Moreton may respond. After the time periods for the filings on hearing costs have run, the Board will issue a final opinion and order imposing the civil penalty on Moreton and assessing against him any appropriate hearing costs.

This interim opinion constitutes the Board's interim findings of fact and conclusions of law.

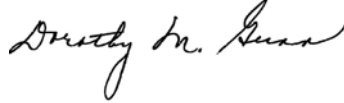
ORDER

1. The Board finds that Michael Moreton (Moreton) violated Sections 21(p)(1) and (7) of the Act (415 ILCS 5/21(p)(1), (7) (2004)).
2. The Agency and the Clerk of the Board must each file a statement of hearing costs with the Board on or before February 22, 2007. The statements must be supported by affidavit and served upon Moreton.
3. Moreton may file with the Board a response to the statements of hearing costs required by paragraph 2 of this order. The response must be filed on or before

March 14, 2007, and must be served on the Agency. The Agency may file a reply to the response within 14 days after being served.

IT IS SO ORDERED

I, Dorothy M. Gunn, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above interim opinion and order on February 1, 2007, by a vote of 4-0.

A handwritten signature in black ink, appearing to read "Dorothy M. Gunn". The signature is written in a cursive style with a large, looped initial "D".

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board